

Plaintiffs hereby move the Court pursuant to Rule 65(a) of the Federal Rules of Civil Procedure, for an order granting a preliminary injunction set forth in the proposed preliminary injunction order served herewith.

Plaintiffs challenge the validity of St. Paul Ordinance 20-14 (the “Ordinance”) as passed by Defendant as it effects an unconstitutional taking of Plaintiffs’ property and interferes with Plaintiffs’ fundamental property rights without substantive due process.

Plaintiffs submit that they meet the standards for a preliminary injunction, *i.e.*, they has probable success on the merits, they will be irreparably harmed, others will not be substantially harmed by the granting of a preliminary injunction, the public interest will be served by a preliminary injunction and there is no adequate remedy at law.

Because a preliminary injunction presents no monetary risks to Defendant, Plaintiffs requests either no bond, or that bond be set at \$1. Fed. R. Civ. P. 65(c).

Pursuant to Local Rule 7.1(a)(1)(A), Plaintiffs were unable to meet and confer prior to filing this motion, but will meet and confer with the opposing counsel as soon as they appear. At that time, Plaintiffs will supplement this motion with a meet-and-confer statement.

Said motion is based upon the Memorandum of Law, the Complaint, Declarations of Mark Jacobson, Lisa Moe, Chue Kue, Lucas Goring, Leanna Stefaniak, and all of the files, records and proceedings herein.

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